

REMARKS

Applicants appreciate the indication of allowable subject matter in Claims 6, 9, and 10. It is requested that the redrafting of these dependent claims in independent form be held in abeyance until review and consideration of the remarks, amended claims and new claims submitted herewith.

Applicants have attempted to address the 35 U.S.C. § 112 issues in reference to the terminology of banknotes. If they have failed to do so, the undersigned attorney would appreciate a telephone conference on this matter. As the Examiner is aware, a plurality of banknotes are stored and released one at a time for transportation wherein rejected banknotes can accumulate in one section of a safe unit while a predetermined number of banknotes can be accumulated for subsequent discharge to the user.

The present invention is applicable in the field of monetary instruments as defined by the preamble of our claims.

Claims 1, 2 and 7 were rejected as being obvious over a combination of the *Brennen* (U.S. Patent No. 4,570,801) in view of the *Hori* (U.S. Patent No. 5,462,267).

The *Brennen* reference was relevant in disclosing a currency handling machine where individual bills have significant monetary value. The *Brennen* reference sought to solve a problem in the prior art that existed when a stack of bills was mounted on a pusher plate and biased by a helical spring to a feed position. The pressure generated by the helical spring was not constant and, accordingly, when only a few bills were still in storage, a jamming condition could occur because of the reduced pressure.

Brennen solved this problem by the use of an endless belt carrying a pusher plate to push the bills towards a sheet by sheet feeder.

As noted, a picker roller 46 is utilized to direct an uppermost bill downward to a feed roller unit. As noted on Paragraph 4, lines 50-56, the driving of the feed roller unit was of a conventional type and not described in the specification. The Office Action acknowledged that there was no teaching of a one-way clutch within a feed roller in the *Brennen* disclosure. Since the principal reference was lacking a teaching of the present invention, the *Hori* reference in the field of Minolta copying machines was relied upon to teach a one-way clutch position on a pick-up roller.

As shown in Figures 1a and 1b, the *Hori* pick-up roller was controlled by a solenoid 11 to be able to reduce the amount of downward pressure exerted by the pick-up roller on the stack of sheets. Thus, a change in size of the downward force arrow, shown between Figure 1a and Figure 1b, illustrates the difference between the activation of a solenoid 11. In essence, when the solenoid was activated, the roller 11 had a reduced pressure contact with the sheet to facilitate the movement by the forward rotation roller 2. Note, there is also a reverse rotation roller 3 at the bottom of the forward rotation roller 2 to prevent any release of duplicated sheets.

As can be determined, the force exerted by the spring 6 is reduced when the solenoid is switched on. As can be seen in Column 3, lines 2-8, a holder 7 is forced to rotate in a clockwise direction by the activation of the solenoid 11.

The present invention uses a feed roller having a peripheral edge that stays in a fixed position. The stacked banknotes are arranged in an inclined manner as shown in Figure 1 and are delivered to the fixed position of the feed roller 22. The feed roller is driven directly by a motor 20 and there is no requirement of a solenoid and a pivoting holder 7 to accommodate different pressures that are required apparently in the dispensing of copying paper.

Hori does not teach a pressure roller in a transporting unit but rather provides a reverse rotation roller from being released when the picking roller is under reduced pressure.

These novel features are now found in the independent claims submitted for reconsideration.

Claims 3-5 were rejected over a combination of *Brannen* and *Hori* reference, when further taken in view of the *Kline et al.* (U.S. Patent No. 6,705,470). The *Kline et al.* reference did not address the advantages of the present invention with a one-way clutch and a relatively simplified construction of a feed roller and banknote storage unit in a safe unit. The *Kline et al.* reference was of interest in disclosing the dispensing of money and the utilization of a number of sensors to provide output signals to a control unit. The *Kline et al.* reference, however, did not address the claimed features distinguishing the *Hori* and *Brannen* reference and, accordingly, the combination of three references does not render obvious the amended claims and the newly submitted claims.

The present invention provides in a relatively crowded field, innovative features of the fixed location of the feed roller that can supply a banknote at a first speed so that it can be nipped in a transportation unit including a first roller and a pressure roller in a relatively small configuration. Since the feed roller is operating at a first speed and the banknote is being pulled by the first roller and the pressure roller at a higher second speed, any shearing force can be relieved by the operation of the one-way clutch. Thus, an increased speed of dispensing of banknotes in a relatively small banknote dispensing device is accomplished.

In the *Brannen* disclosure, the cartridge 16 which presumably is contended to be corresponding to our banknote safe, includes a picker roller 46, a main feed roller 52 and a

pressure roller 54. Our banknote safe, however, does not require such rollers and can be constructed in a relatively small and lightweight design that is convenient to be carried.

The *Hori* reference requires the pickup roller to be moved by a solenoid to thereby reduce the contacting force of the feed roller on the sheets that are to be dispensed. Thus, the *Hori* reference requires not only the solenoid 11, but the holder 7 and the other component parts 12, 13, 14 and 20 to be provided. A document dispenser in a copying machine is expected to be relatively large and expensive and, accordingly, would not teach the features of the present invention which enable an economical configuration of a banknote dispensing device. Needless to say, the present invention does not use reverse rotation roller as required in the *Hori* disclosure.

Referring to the amended claims, the peripheral edge of our feed roller contacts a surface of an uppermost banknote, and the peripheral edge is maintained at a fixed position with the banknote supplying storing section advancing the banknote to the fixed position. The extra cost, weight and expense of the solenoid of the *Hori et al.* invention which moves the location of the feed roller by clockwise rotation of the holder 7 is thereby distinguished. Our transporting unit further includes a first roller and a pressure roller in contact at a periphery to form a passageway for the banknote when it is still in contact with the feed roller.

It is believed that these features in the amended and newly submitted claims adequately distinguish over any combination of the cited references under 35 U.S.C. § 103.

As noted in the case of *Continental Can Co. USA Inc. v. Monsanto Co.*, 20 USPQ 2d 1746, 1752 (Fed Cir. 1991):

Thus when differences that may appear technologically minor nonetheless have a practical impact, particularly in a

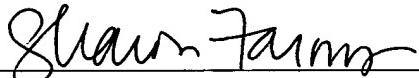
crowded field, the decision-maker must consider the obviousness of the new structure in this light.

It is respectfully submitted that the crowded state of this art and the distinguishing features set forth in our claims more than adequately justify the issuing of a patent.

If the Examiner believes that a telephone interview will help further the prosecution of this case, he is respectfully requested to contact the undersigned attorney at the listed telephone number.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on March 15, 2005.

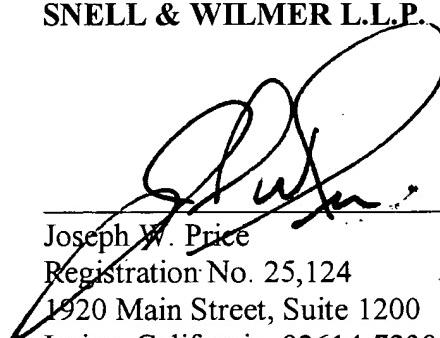
By: Sharon Farnus



Signature

Very truly yours,

SNELL & WILMER L.L.P.



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